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Attorneys for Plaintiff,
ALEX VILLANUEVA

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA,
Plaintiff,

VS.

COUNTY OF LOS ANGELES,
COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT, LOS
ANGELES COUNTY BOARD OF
SUPERVISORS, COUNTY EQUITY
OVERSIGHT PANEL, LOS
ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL,
CONSTANCE KOMOROSKI,
MERCEDES CRUZ, ROBERTA
YANG, LAURA LECRIVAIN,
SERGIO V. ESCOBEDO, RON
KOPPERUD, ROBERT G. LUNA,
MAX-GUSTAF HUNTSMAN,
ESTHER LIM, and DOES 1 to 100,
inclusive,

Defendants.

Case No.: 2:24 cv 04979 SVW (JC)

The Honorable Stephen V. Wilson

**DECLARATION OF ALEX DIBONA,
ESQ., IN OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OR, IN THE
ALTERNATIVE, SUMMARY
ADJUDICATION**

(Filed concurrently with Memorandum of Points and Authorities; [Proposed] Order)

Date: May 19, 2025
Time: 1:30 p.m.
Dept.: 10A

Trial Date: June 3, 2025
Action Filed: June 13, 2024

DECLARATION OF ALEX DIBONA

I, Alex DiBona, declare as follows:

1. I am an attorney at law, duly authorized to practice law before all of the courts of the State of California and this honorable Court. I am an attorney of record for plaintiff, Alex Villanueva, in this case. I am familiar with the files, pleadings, and facts in this case and could and would competently testify to the following facts on the basis of my own personal knowledge.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Los Angeles County Board of Supervisors Motion titled "Report Regarding Options for Removing the Sheriff" dated October 27, 2020, which was authenticated at the deposition of Kyla Coates, Pages 74:1-25.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Ordinance allowing the Office of Inspector General to Issue Subpoenas authored by Veronica Pawlowski dated January 21, 2020, which was produced in discovery by the County of Los Angeles as part of their discovery responses.

4. Attached hereto as Exhibit 5 is a true and correct copy of "Tweets" from Ester Lim which were authenticated at her deposition at pages 83:15-84:12

5. Attached hereto as Exhibit 9 is a true and correct copy of the Email from Ester Lim to Hilda Solis's Chief of Staff Cindy Chen dated March 8, 2022, which was produced in discovery and/or authenticated at deposition of Ester Lim at 143:23-144:2

6. Attached hereto as Exhibit 10 is a true and correct copy of Ester Lim's Letter to Vicky Bane, Executive Director of the County Equity Oversight Panel for the County of Los Angeles, dated March 8, 2022, which was produced in discovery by the County of Los Angels.

7. Attached hereto as Exhibit 11 is a true and correct copy of Ester Lim's submitted online complaint regarding Alex Villanueva dated March 8, 2022, which was produced in discovery and authenticated at deposition of Ester Lim at 149:13-19

1 8. Attached hereto as Exhibit 12 is a true and correct copy of Texts between Ester
2 Lim and Max Huntsman regarding their complaints, dated sometime in March 2022, which
3 were produced in discovery and/or authenticated at deposition of Ester Lim at 203:25-
4 204:5

5 9. Attached hereto as Exhibit 14 is a true and correct copy of the July 12, 2022
6 Motion of the Los Angeles Board of Supervisors to place a Ballot Measure to remove the
7 Sheriff by a 4/5 vote

8 10. Attached hereto as Exhibit 17 is a true and correct copy of the Internal Affairs
9 Bureau “Stacked” Case file for Ester Lim’s Complaint regarding Alex Villanueva
10 completed October 2, 2023, which was produced in discovery and/or authenticated at
11 deposition of Anne Devane at P 128:1-25

12 11. Attached hereto as Exhibit 18 is a true and correct copy of the Internal Affairs
13 Bureau “Stacked” Case file for Max Huntsman’s Complaint regarding Alex Villanueva
14 completed October 2, 2023, which was produced in discovery and/or authenticated at
15 deposition deposition of Anne Devane at P 154:1-25.

16 12. Attached hereto as Exhibit 19 is a true and correct copy of the Internal Affairs
17 Bureau Investigator’s Log regarding Ester Lim’s Complaint completed October 2, 2023,
18 which was produced in discovery and/or authenticated at deposition of Anne Devane at P
19 88:1-25

20 13. Attached hereto as Exhibit 20 is a true and correct copy of the Internal Affairs
21 Bureau Investigator’s Log regarding Max Huntsman’s Complaint completed October 2,
22 2023, which was produced in discovery and/or authenticated at deposition Anne Devane
23 at P 101:1-25

24 14. Attached hereto as Exhibit 21 is a true and correct copy of the Letter from Sergio
25 Escobedo to the County Equity Oversight Panel regarding founded charges dated October
26 17, 2023, which was produced in discovery and/or authenticated at deposition of Sergio
27 Escobedo at 126:1-12.

28 15. Attached hereto as Exhibit 22 is a true and correct copy of Texts between Ester

1 Lim and Max Huntsman regarding wanting their complaints about Alex Villanueva to go
2 public in December 2023, which were produced in discovery and/or authenticated at
3 deposition of Ester Lim at 211:22-212:3.

4 16. Attached hereto as Exhibit 24 is a true and correct copy of relevant excerpts from
5 the deposition of Anne Devane.

6 17. Attached hereto as Exhibit 25 is a true and correct copy of relevant excerpts from
7 the deposition of Christian Diaz Herrera.

8 18. Attached hereto as Exhibit 26 is a true and correct copy of relevant excerpts from
9 the deposition of Constance Komoroski.

10 19. Attached hereto as Exhibit 27 is a true and correct copy of relevant excerpts from
11 the deposition of Veronica Pawlowski.

12 20. Attached hereto as Exhibit 28 is a true and correct copy of relevant excerpts from
13 the deposition of Timothy Murakami.

14 21. Attached hereto as Exhibit 29 is a true and correct copy of relevant excerpts from
15 the deposition of Sergio Escobedo.

16 22. Attached hereto as Exhibit 30 is a true and correct copy of relevant excerpts from
17 the deposition of Mark Lilienfeld.

18 23. Attached hereto as Exhibit 31 is a true and correct copy of relevant excerpts from
19 the deposition of Ester Lim.

20 24. Attached hereto as Exhibit 32 is a true and correct copy of relevant excerpts from
21 the deposition of Max Huntsman.

22 25. Attached hereto as Exhibit 33 is a true and correct copy of relevant excerpts from
23 the deposition of Mercedes Cruz.

24 26. Attached hereto as Exhibit 34 is a true and correct copy of relevant excerpts from
25 the deposition of Laura Lcrevian.

26 27. Attached hereto as Exhibit 35 is a true and correct copy of relevant excerpts from
27 the deposition of Kyla Coates.

28 28. Attached hereto as Exhibit 36 is a true and correct copy of relevant excerpts from

1 the deposition of Roberta Yang.

2 29. Attached hereto as Exhibit 37 is a true and correct copy of the transcript excerpts
3 from the Los Angeles County Board of Supervisors meeting held on December 18, 2018,
4 which were obtained through the Los Angeles County's official website for such
5 transcripts.

6 30. Attached hereto as Exhibit 38 is a true and correct copy of the transcript excerpts
7 from the Los Angeles County Board of Supervisors meeting held on January 29, 2019,
8 which were obtained through the Los Angeles County's official website for such
9 transcripts.

10 31. Attached hereto as Exhibit 39 is a true and correct copy of the transcript excerpts
11 from the Los Angeles County Board of Supervisors meeting held on August 13, 2019,
12 which were obtained through the Los Angeles County's official website for such
13 transcripts.

14 32. Attached hereto as Exhibit 40 is a true and correct copy of the transcript excerpts
15 from the Los Angeles County Board of Supervisors meeting held on October 1, 2019,
16 which were obtained through the Los Angeles County's official website for such
17 transcripts..

18 33. Attached hereto as Exhibit 41 is a true and correct copy of the transcript excerpts
19 from the Los Angeles County Board of Supervisors meeting held on October 15, 2019,
20 which were obtained through the Los Angeles County's official website for such
21 transcripts.

22 34. Attached hereto as Exhibit 42 is a true and correct copy of the transcript excerpts
23 from the Los Angeles County Board of Supervisors meeting held on January 28, 2020,
24 which were obtained through the Los Angeles County's official website for such
25 transcripts.

26 35. Attached hereto as Exhibit 43 is a true and correct copy of the transcript excerpts
27 from the Los Angeles County Board of Supervisors meeting held on March 31, 2020,
28 which were obtained through the Los Angeles County's official website for such

1 transcripts.

2 36. Attached hereto as Exhibit 44 is a true and correct copy of the transcript excerpts
3 from the Los Angeles County Board of Supervisors meeting held on April 28, 2020, which
4 which were obtained through the Los Angeles County's official website for such
5 transcripts..

6 37. Attached hereto as Exhibit 45 is a true and correct copy of the transcript excerpts
7 from the Los Angeles County Board of Supervisors meeting held on June 29, 2020, which
8 which were obtained through the Los Angeles County's official website for such
9 transcripts.

10 38. Attached hereto as Exhibit 46 is a true and correct copy of the transcript excerpts
11 from the Los Angeles County Board of Supervisors meeting held on July 7, 2020, which
12 which were obtained through the Los Angeles County's official website for such
13 transcripts.

14 39. Attached hereto as Exhibit 47 is a true and correct copy of the transcript excerpts
15 from the Los Angeles County Board of Supervisors meeting held on July 21, 2020, which
16 which were obtained through the Los Angeles County's official website for such transcripts.

17 40. Attached hereto as Exhibit 48 is a true and correct copy of the transcript excerpts
18 from the Los Angeles County Board of Supervisors meeting held on July 28, 2020, which
19 which were obtained through the Los Angeles County's official website for such transcripts.

20 41. Attached hereto as Exhibit 49 is a true and correct copy of the transcript excerpts
21 from the Los Angeles County Board of Supervisors meeting held on August 4, 2020,
22 which were obtained through the Los Angeles County's official website for such
23 transcripts.

24 42. Attached hereto as Exhibit 50 is a true and correct copy of the transcript excerpts
25 from the Los Angeles County Board of Supervisors meeting held on September 1, 2020,
26 which were obtained through the Los Angeles County's official website for such
27 transcripts.

28 43. Attached hereto as Exhibit 51 is a true and correct copy of the transcript excerpts

1 from the Los Angeles County Board of Supervisors meeting held on September 15, 2020,
2 which were obtained through the Los Angeles County's official website for such
3 transcripts.

4 44. Attached hereto as Exhibit 52 is a true and correct copy of the transcript excerpts
5 from the Los Angeles County Board of Supervisors meeting held on October 13, 2020,
6 which were obtained through the Los Angeles County's official website for such
7 transcripts.

8 45. Attached hereto as Exhibit 53 is a true and correct copy of the transcript excerpts
9 from the Los Angeles County Board of Supervisors meeting held on October 27, 2020,
10 which were obtained through the Los Angeles County's official website for such
11 transcripts.

12 46. Attached hereto as Exhibit 54 is a true and correct copy of the transcript excerpts
13 from the Los Angeles County Board of Supervisors meeting held on November 10, 2020,
14 which were obtained through the Los Angeles County's official website for such
15 transcripts.

16 47. Attached hereto as Exhibit 55 is a true and correct copy of the transcript excerpts
17 from the Los Angeles County Board of Supervisors meeting held on January 26, 2021,
18 which were obtained through the Los Angeles County's official website for such
19 transcripts.

20 48. Attached hereto as Exhibit 56 is a true and correct copy of the transcript excerpts
21 from the Los Angeles County Board of Supervisors meeting held on May 4, 2021, which
22 which were obtained through the Los Angeles County's official website for such
23 transcripts.

24 49. Attached hereto as Exhibit 57 is a true and correct copy of the transcript excerpts
25 from the Los Angeles County Board of Supervisors meeting held on May 18, 2021, which
26 which were obtained through the Los Angeles County's official website for such
27 transcripts.

28 50. Attached hereto as Exhibit 58 is a true and correct copy of the transcript excerpts

1 from the Los Angeles County Board of Supervisors meeting held on May 19, 2021, which
2 were obtained through the Los Angeles County's official website for such transcripts.

3 51. Attached hereto as Exhibit 59 is a true and correct copy of the transcript excerpts
4 from the Los Angeles County Board of Supervisors meeting held on June 22, 2021, which
5 were obtained through the Los Angeles County's official website for such transcripts.

6 52. Attached hereto as Exhibit 60 is a true and correct copy of the transcript excerpts
7 from the Los Angeles County Board of Supervisors meeting held on July 27, 2021, which
8 were obtained through the Los Angeles County's official website for such transcripts.

9 53. Attached hereto as Exhibit 61 is a true and correct copy of the transcript excerpts
10 from the Los Angeles County Board of Supervisors meeting held on August 10, 2021,
11 which were obtained through the Los Angeles County's official website for such
12 transcripts.

13 54. Attached hereto as Exhibit 62 is a true and correct copy of the transcript excerpts
14 from the Los Angeles County Board of Supervisors meeting held on September 28, 2021,
15 which were obtained through the Los Angeles County's official website for such
16 transcripts.

17 55. Attached hereto as Exhibit 63 is a true and correct copy of the transcript excerpts
18 from the Los Angeles County Board of Supervisors meeting held on December 7, 2021,
19 which were obtained through the Los Angeles County's official website for such
20 transcripts.

21 56. Attached hereto as Exhibit 64 is a true and correct copy of the transcript excerpts
22 from the Los Angeles County Board of Supervisors meeting held on February 15, 2022,
23 which were obtained through the Los Angeles County's official website for such
24 transcripts.

25 57. Attached hereto as Exhibit 65 is a true and correct copy of the transcript excerpts
26 from the Los Angeles County Board of Supervisors meeting held on March 1, 2022, which
27 were obtained through the Los Angeles County's official website for such transcripts.

28 58. Attached hereto as Exhibit 66 is a true and correct copy of the transcript excerpts

1 from the Los Angeles County Board of Supervisors meeting held on July 12, 2022, which
2 were obtained through the Los Angeles County's official website for such transcripts.

3 59. I declare, under penalty of perjury under the laws of the State of California and
4 the United States of America, that the foregoing is true and correct.

5 Executed on this 28th day of April, 2025, at Los Angeles, California.

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7 _____
8 Alex DiBona, Esq.

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1 **VILLANUEVA v. COUNTY OF LOS ANGELES, et al. USDC Case No. 2:24 cv 04979 SVW (JC)**

2 **PROOF OF SERVICE**

3 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

4 I am an employee in the County of Los Angeles, State of California. I am over the
5 age of 18 and not a party to the within action; my business address is 11520 San Vicente
Boulevard, Los Angeles, California 90049.

6 On April 28, 2025, I served the foregoing document, described as "**DECLARATION
7 OF ALEX DIBONA, ESQ., IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, SUMMARY
ADJUDICATION**" on all interested parties in this action addressed as follows:

8 **Louis R. Miller (State Bar No. 54141)**

9 **smiller@millerbarondess.com**

10 **Jason H. Tokoro (State Bar No. 252345)**

11 **jtokoro@millerbarondess.com**

12 **Steven G. Williamson (State Bar No. 343842)**

13 **swilliamson@millerbarondess.com**

14 **MILLER BARONDESS, LLP**

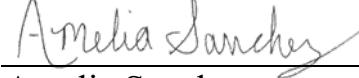
15 **2121 Avenue of the Stars, Suite 2600**

16 **Los Angeles, California 90067**

17 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
18 document(s) with the Clerk of the Court by using the CM/ECF system. Participants
19 in the case who are registered CM/ECF users will be served by the CM/ECF system.
20 Participants in the case who are not registered CM/ECF users will be served by mail
21 or by other means permitted by the court rules.

22 **(FEDERAL)** I declare that I am employed in the office of a member of the bar of
23 this Court at whose direction the service was made.

24 Executed on April 28, 2025, at Los Angeles, California.

25 
26 _____
27 **Amelia Sanchez**

28